

# **Status Report: Programmatic Subcommittee Work on Overwater Structure Maintenance and Repair Activities**

December 2003 Transportation Permit Efficiency and Accountability Committee

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Reviewed by: Programmatic Subcommittee

## **Why are we here today?**

We are here to present a status report on the Programmatic Subcommittee's effort to develop multi-agency programmatic permit coverage for Overwater Structure Maintenance and Repair Activities.

## **Where are we now?**

On June 2003 the Programmatic Subcommittee developed final Unified Conditions document that covered WSDOT overwater and ferry structure maintenance and repair work. This final document would lead to the issuance of programmatic permits by both Ecology and Department of Fish and Wildlife.

On June 16, 2003 Washington State Department of Fish and Wildlife issued a 5-year general HPA permit that provides programmatic coverage for that agency for all of the activities covered in the Unified Conditions document. This programmatic permit is already being used in the field for various transportation activities and has resulted in time and cost savings associated with processing permit applications as well as protection of the environment.

On October 24, 2003 Ecology provided WSDOT with a draft NPDES (National Pollutant Discharge Elimination System) permit and fact sheet for review and comment. This permit establishes thresholds for discharge of wash water associated with bridge and ferry terminal washing activities. On November 13<sup>th</sup>, WSDOT submitted comments on the draft NPDES permit to Ecology. In summary, conditions of the permit will allow continued use of "filter tarp" treatment for discharge water for painting activities in streams where the stream flow is greater than 55cfs. This threshold will cover approximately 60% of WSDOT steel bridges that are subject to the painting program. In addition, painting projects that meet this standard are expected to have a 50-100% reduction in cost compared to a full containment method.

## **Next Steps:**

Ecology will issue the final NPDES permit during the 1<sup>st</sup> week of December for 30 day public comment. Following the public comment period the permit will become final.

WSDOT will fulfill monitoring and reporting requirements associated with use of the permit.

### **Status:**

- June 2003 – Programmatic Agreement finalized.
- June 2003 – 5 year General HPA issued by WDFW.
- December 2, 2003 – Ecology to issue final NPDES Permit for 30 day public review.

### **Terms and Conditions:**

#### **General HPA:**

- 5 year permit.
- Covers all bridge and ferry terminal maintenance work.

#### **NPDES Permit:**

- 5 year permit.
- Maintenance washing occurs during wet months (no containment).
- Painting prep washing can use tarp filter treatment on streams greater than 55 cfs.
- Painting prep washing must use full containment of wash water on streams less than 55 cfs.
- Monitoring discharge water is required.